

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

ALLISON HETRICK, individually and on  
behalf of all others similarly situated,

Plaintiff,

v.

ASCEND LEARNING, LLC,

Defendant.

Civil Action No. 1:25-cv-10103

**MOTION FOR ADMISSION *PRO HAC VICE* OF TYLER K. SOMES ON BEHALF OF  
PLAINTIFFS**

William F. Sinnott, as a member in good standing of the Massachusetts Bar and of the Federal District Court of the District of Massachusetts, in accordance with Rule 83.5.3 of the Local Rules of the U.S. District Court for the District of Massachusetts, respectfully moves this Honorable Court for the admission of Tyler K. Somes, Esquire, to practice law *pro hac vice* before this Court in this matter. As grounds, therefore, Attorney William F. Sinnott hereby certifies, and states as follows:

1. William F. Sinnott (the “Undersigned”) is a member in good standing of the Massachusetts Bar and has been licensed to practice law before the Courts of the Commonwealth of Massachusetts since 1985;
2. The Undersigned is admitted to practice law before the Federal District Court for the District of Massachusetts;
3. The Undersigned intends to act as local counsel in this matter for Plaintiffs. As such, the Undersigned seeks to have Attorney Tyler K. Somes admitted *pro hac vice* to serve as co-counsel for Plaintiffs;

4. Tyler K. Somes, Esquire is a member in good standing of the bar for the District of Columbia and has been a member of that bar since May, 2023, *see* signed Certification of Attorney Tyler K. Somes attached hereto as ***Exhibit 1***;

5. Tyler K. Somes, Esquire is a member in good standing of every jurisdiction where he has been admitted to practice law;

6. Tyler K. Somes, Esquire has no disciplinary proceedings pending against him;

7. Tyler K. Somes, Esquire has not previously had a *pro hac vice* admission (or other limited purpose admission) to this Court revoked for misconduct;

8. Tyler K. Somes, Esquire, has read and agrees to comply with the Local Rules of the U.S. District Court for the District of Massachusetts; and

9. The address for Tyler K. Somes, Esquire, is as follows:

Tyler K. Somes  
District of Columbia Bar No. 90013925  
**HEDIN LLP**  
1100 15<sup>th</sup> Street NW, Ste 04-108  
Washington, DC 20005  
Telephone: (202) 900-3332  
tsomes@hedinllp.com

**WHEREFORE**, William F. Sinnott, Esquire, hereby moves this Honorable Court for the grant of an order allowing Tyler K. Somes, Esquire, to appear *pro hac vice* in this matter.

By: /s/ William F. Sinnott  
William F. Sinnott, BBO #547423  
HINCKLEY, ALLEN & SNYDER LLP  
28 State Street  
Boston, MA 02109  
wsinnott@hinckleyallen.com  
Tel: (617) 345-9000  
Fax: (617) 345-9020  
ATTORNEY FOR PLAINTIFFS

**CERTIFICATE OF SERVICE**

I, William F. Sinnott, hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants.

Dated: January 23, 2025

/s/ William F. Sinnott

William F. Sinnott